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[1] Q. Was it a joint ownership or was the house
[2] owned -- was it a joint ownership?
[3] A. Yes.
[4] Q. For how long did you own that home?
[5] A. About thirty years.
[6] Q. That takes me to 1999. Is that right?
[7] A. Somewhere around there.
[8] Q. Did you then sell the house?
[9] A. No.
[10] Q. What happened to your ownership in the
[11] house after approximately thirty years?
[12] A. We put it into a trust.
[13] Q. Okay. What trust?
[14] A. I believe they call it a granters reserve
[15] trust.
[16] Q. When did you do that?
[17] A. I would have to find that out for you.
[18] Q. How would you go about doing that?
[19] A. Go find the trust.
[20] MR. HART: As we get through some of
[21] this, there could be a lot of
[22] intertwining of, like the trust and who
[23] it would go to and things along those
[24] lines. We would ask, if you don't mind,

[1] MR. CASEY: Dan, do we have that
[2] document?
[3] MR. HART: No.
[4] MR. CASEY: Can I have them?
[5] MR. HART: If you make a request.
[6] MR. CASEY: I am making that request
[7] now.
[8] MR. HART: I don't know if we have
[9] them here.
[10] BY MR. CASEY:
[11] Q. You told me that you owned the house for
[12] approximately thirty years. Can you tell me,
[13] with any more specificity, when that conveyance
[14] was made?
[15] A. I assume you will find that out when we
[16] get that document, and it will give a date of
[17] transfer.
[18] Q. Can you give me, sir, your own
[19] understanding as to the date of --
[20] A. I don't know.
[21] Q. You can't give me any more specific date
[22] other than approximately 1999?
[23] A. Somewheres around there, yes.
[24] Q. But from what you're telling me, I

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[1] can we agree to confidentiality for this
[2] transcript? At this point you just have
[3] facts, which are of no consequence.
[4] MR. CASEY: Yes, we can talk about
[5] that maybe during a break. But I don't
[6] think there is going to be any problem
[7] with that. Can we just find out who,
[8] rather than having me ask a lot of
[9] questions about it, can you tell me who
[10] owned the house on the date of the
[11] drowning?
[12] THE WITNESS: It was in trust.
[13] BY MR. CASEY:
[14] Q. Who was the trustee?
[15] MR. HART: That you can answer.
[16] BY MR. CASEY:
[17] Q. Who was the trustee?
[18] A. Barbara Longwill.
[19] Q. Who is Barbara Longwill?
[20] A. My wife.
[21] Q. Do you have trust documents reflecting
[22] this conveyance from your ownership with your
[23] wife to the trust?
[24] A. Yes.

[1] understand that on the date of your
[2] granddaughter's death, you're confident that
[3] the trust owned your Coachman Road house?
[4] A. Correct.
[5] Q. For what reason did you make that
[6] conveyance from your individual ownership to
[7] the trust in the name of your wife?
[8] MR. HART: I'm going to have to
[9] object because the scope of the
[10] deposition here is venue and
[11] jurisdiction, as far as his individual
[12] contacts with the Commonwealth of
[13] Pennsylvania. His motivation for
[14] forming the trust, I don't think, has
[15] anything to do with the issues here.
[16] BY MR. CASEY:
[17] Q. Were there any other entities, other than
[18] your wife, named as trustee?
[19] A. No.
[20] Q. Do you own any businesses today, sir?
[21] A. Personally?
[22] Q. Yes.
[23] A. No.
[24] Q. Do you, through any corporate or other

[1] Inc.?

[2] **MR. HART:** Objection, that's beyond
[3] the scope of the notice, what those
[4] corporate entities have to do with him.

[5] **MR. CASEY:** Dan, I really, I think
[6] I'm entitled to ask questions that are
[7] reasonably calculated to lead to the
[8] discovery of the information that I'm
[9] entitled to get under the judge's order.
[10] And all I am interested in knowing who
[11] owns these companies and towards the end
[12] of establishing venue or/and
[13] jurisdictional contact. And I suggest
[14] to you that these are perfectly
[15] acceptable questions. And I don't want
[16] to bring him back but it seems to me
[17] that we are headed in that direction.

[18] **MR. HART:** Well, we've already
[19] discussed his ownership in those
[20] companies.

[21] **BY MR. CASEY:**

[22] **Q.** Who else owns the companies with you?

[23] **A.** Barbara Longwill.

[24] **Q.** And we're talking about Air Base Carpet

[1] open?

[2] **A.** Carpet Mart, Inc. opened somewhere in
[3] the early '70s.

[4] **Q.** How about Reading Carpet Factory Outlet?

[5] **A.** I think probably '72.

[6] **Q.** How about Yorktown Carpet Mart?

[7] **A.** Mid '70s, I don't have specific dates for
[8] all this.

[9] **Q.** That's all I'm asking for is general time
[10] frames. Lomax?

[11] **A.** Probably in the '80s.

[12] **Q.** Did you sign any of the documents of
[13] incorporation for any of those businesses?

[14] **A.** Possibly.

[15] **Q.** Do you expect that you did, sir?

[16] **A.** Some of them were signed by my father,
[17] who's since deceased.

[18] **Q.** When did he die?

[19] **A.** Seven years ago.

[20] **Q.** But do you expect that you yourself
[21] signed any of them?

[22] **A.** I might have.

[23] **Q.** Lomax, I think you said started in the
[24] mid '80s?

[1] Mart, Inc.?

[2] **A.** Yes.

[3] **Q.** Who else?

[4] **A.** That's it.

[5] **MR. HART:** He said it's fifty/fifty.

[6] **BY MR. CASEY:**

[7] **Q.** So I assume from your answer that no
[8] corporate entity has any ownership interest in
[9] the Air Base Carpet Mart, Inc., is that
[10] correct?

[11] **A.** Can you rephrase that?

[12] **Q.** You told me --

[13] **A.** Are you saying that one corporation owns
[14] part of another corporation?

[15] **Q.** Yes, that's what I'm saying.

[16] **A.** No.

[17] **Q.** So no corporate entity has any ownership
[18] interest in Air Base Carpet Mart, Inc., is that
[19] correct?

[20] **MR. HART:** Objection, asked and
[21] answered.

[22] **THE WITNESS:** That's correct.

[23] **BY MR. CASEY:**

[24] **Q.** When did Lancaster Carpet Mart, Inc.

[1] **A.** Yes.

[2] **Q.** Do you expect that you signed any of the
[3] corporate documents for Lomax Home Center?

[4] **A.** I may have.

[5] **Q.** Who owns the buildings in which these
[6] businesses operate?

[7] **A.** I do, with my wife.

[8] **Q.** You do individually with your wife?

[9] **MR. MINTZER:** Objection.

[10] **MR. HART:** Objection to the form.

[11] **MR. HART:** The question is who owns
[12] them.

[13] **THE WITNESS:** R and B Real Estate.

[14] **BY MR. CASEY:**

[15] **Q.** What is R and B Real Estate?

[16] **A.** A Real Estate partnership.

[17] **Q.** Are you a partner of R and B Real Estate?

[18] **A.** Yes.

[19] **Q.** Does R and B stand for Richard and
[20] Barbara?

[21] **A.** Very good, yes, you're correct.

[22] **Q.** When did you start R and B Real Estate?

[23] **A.** Good question. I don't remember.

[24] **Q.** Can you give me an approximate date?